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10
11 IN THE UNITED STATES DISTRICT COURT
12
13 EASTERN DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,
15 Plaintiff/Respondent,
16 v.
17 HOANG AI LE,
18 Defendant/Movant.

2:99-CR-00433-WBS-AC

20 STIPULATION AND [PROPOSED] ORDER FOR
21 EXTENSION OF TIME IN WHICH TO RESPOND
22 TO DEFENDANT'S SECTION 2255 PETITION

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28 Respondent United States of America, by and through its attorneys of record, Phillip A. Talbert, United States Attorney, and William S. Wong, Assistant United States Attorney, hereby requests an 11-day extension of time until February 28, 2017, in which to file its answering brief to defendant Hoang Ai Le's section 2255 petition.

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30 With apologies to the Court and counsel for the defendant, the Government needs additional time
31 to complete its written opposition because Government's counsel continues to experience problems with
32 his computer. Counsel believes that the problems may finally be under control and barring further
33 computer problems, this extension would permit the Government to file its opposition. Counsel intends
34 to work over the weekend to complete the opposition, but is requesting an additional few days just in
35 case unforeseen problems arise. Geoffrey M. Jones, counsel for defendant has graciously extended
36 professional courtesy and does not oppose the Government's request. Counsel for the defendant requests
37 that he be given 30 days to file his reply.

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2 Dated: February 17, 2017

PHILLIP A. TALBERT
United States Attorney

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4 /s/ WILLIAM S. WONG
5 WILLIAM S. WONG
6 Assistant United States Attorney

7 Dated: February 17, 2017

8 /s/ GEOFFREY M. JONES
9 GEOFFREY M. JONES
10 Attorney for Hoang Ai Le

11 **[PROPOSED] ORDER**

12 The Court, having received, read, and considered the stipulation of the parties, and good cause
13 appearing therefrom, adopts the stipulation of the parties in its entirety as its order.

14 It is further ordered that the Government's answering brief to defendant's section 2255 petition is
15 now due February 28, 2017. The defendant's reply, if any, is due 30 days thereafter.

16 DATED: February 21, 2017

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18 ALLISON CLAIRE
19 UNITED STATES MAGISTRATE JUDGE